Universal Service Issues in Wireline Broadband Internet Access Proceeding

Appropriate Framework for Broadband Access to the Internet Over Wireline Facilities

CC Docket No. 02-33

- The promotion of broadband deployment is a central policy of the Commission.
- Universal service mechanisms have promoted broadband deployment in rural areas.
- It would be ironic if the Commission were to jeopardize universal service and the broadband deployment, which it enables in the name of creating "regulatory parity" for high-speed Internet access services.
- The existing universal service funds depend on mandatory contributions from providers of "telecommunications services."
- The reclassification of wireline high-speed Internet access services will remove these services, cable modem and high-speed services provided with other technologies from the assessment base.
 - Removal of an entire class of providers interconnected with the public switched network is particularly inappropriate at this juncture when the Commission is considering ways to stabilize the fund.
 - Many parties in this proceeding and in the Contributions docket have suggested that the assessment base should include all providers of highspeed Internet access.
- The reclassification may trigger Separations and Access rule changes that cause cost shifts to the intrastate jurisdiction and that impede rather than promote broadband deployment.
- The reclassification will make it impossible for the Commission to include wireline high-speed Internet access, cable modem services and high-speed services provided with other technologies in the definition of services supported by universal service.